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February 28, 2022

Via CM/ECF

Hon. James L. Cott
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *Franck v. New York Health Care, Inc.*
Civil Action No. 1:21-cv-4955

Dear Magistrate Judge Cott:

We represent the Defendants in the above matter and write in reference to the plaintiffs' letter requesting a pre-motion conference, which was filed late Friday evening, February 25, 2022. (Docket No. 90).

Defendants respectfully request that the Court allow them until Monday, March 7, 2022, to respond to the plaintiffs' request for a pre-motion conference. We believe that this time frame is reasonable and appropriate, because the issues involved are legally substantial and of great practical importance to the parties. Defendants therefore require this time to respond to Plaintiffs' four-page, single spaced letter in a thorough and complete manner. The Defendants further are weighing a possible cross-motion and it would obviously be more efficient for the Court to confer with the parties about any cross-motion at the same time as the Plaintiffs' anticipated motion.

Thank you for your consideration.

Respectfully yours,

A handwritten signature in black ink, appearing to read 'Joshua Feinstein', with a stylized flourish at the end.

Joshua Feinstein

cc: Joshua Feinstein (via CM/ECF)
Andrey Belenky, Esq. (via CM/ECF)
Dmitry A. Kheyfits, Esq. (via CM/ECF)
J. Burkett McInturff, Esq. (via CM/ECF)
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